

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

-----x  
:  
:

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

:  
:  
:  
-----x

**DEBTOR'S OBJECTION TO MOTION OF CREDITORS  
FOR ENTRY OF AN ORDER PURSUANT TO SECTION 105(a)  
OF THE BANKRUPTCY CODE APPOINTING AND DIRECTING  
THE DEBTOR TO COOPERATE WITH A COMMITTEE OF  
CREDITORS AND INTERESTED PERSONS TO ASSESS THE  
ART COLLECTION OF THE DETROIT INSTITUTE OF ARTS  
BASED ON ARMS-LENGTH MARKET TRANSACTIONS  
TO ESTABLISH A BENCHMARK VALUATION [Docket No. 1833]**

The City of Detroit (the "City") hereby objects to the Motion of Creditors for Entry of an Order Pursuant to Section 105(a) of the Bankruptcy Code Appointing and Directing the Debtor to Cooperate with a Committee of Creditors and Interested Persons to Assess the Art Collection of The Detroit Institute Of Arts Based on Arms-Length Market Transactions to Establish a Benchmark Valuation (Docket No. 1833) (the "Art Committee Motion") filed by certain creditors on November 26, 2013. In support of this Objection, the City respectfully represents as follows:

## **Objection**

As set forth in the Brief in Opposition, the Art Committee Motion should be denied because, among other reasons, (i) the movants do not identify a proper statutory basis for the relief sought, (ii) the relief requested would violate sections 904(1), 904(2) and 941 of the Bankruptcy Code and (iii) the relief requested is redundant and unnecessary.

WHEREFORE, for the reasons set forth herein and in the Brief in Opposition, the City respectfully requests that this Court: (i) deny the Art Committee Motion; and (ii) grant such other and further relief to the City as the Court may deem proper.

Dated: December 10, 2013

Respectfully submitted,

/s/ Bruce Bennett

---

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
[bbennett@jonesday.com](mailto:bbennett@jonesday.com)

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
[dgheiman@jonesday.com](mailto:dgheiman@jonesday.com)  
[hlennox@jonesday.com](mailto:hlennox@jonesday.com)

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
[green@millercanfield.com](mailto:green@millercanfield.com)  
[laplante@millercanfield.com](mailto:laplante@millercanfield.com)

ATTORNEYS FOR THE CITY